

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Crim. 17-cr-107(20)(DWF/TNL)

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UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

WARALEE WANLESS,

DEFENDANT.  
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**DEFENDANT'S  
MOTION FOR EARLY  
DISCLOSURE OF  
JENCKS ACT MATERIAL**

Defendant through his undersigned counsel, moves this Honorable Court for an Order, pursuant to Rule 16 of the Federal Rules of Criminal Procedure, requiring the government to disclose, not less than seven days prior to the trial of this cause, all statements and reports within the meaning of the Jencks Act, 18 U.S.C. § 3500, on the following grounds:

1. Although the clear provisions of § 3500 do not require the government to produce Jencks Act material until after a witness testifies at trial on direct examination, defendant suggests that this Court has the inherent power to require the government to produce Jencks Act material prior to trial unless the government can convince the Court that there is some legitimate governmental interest in not doing so.

2. The production of Jencks Act material at trial will necessitate extensive delays during the trial to allow the defense counsel an opportunity to review such material prior to cross-examination of government witnesses. Absent a showing of possible witness harassment or some other valid governmental interest, this Court should exercise its inherent power and require early production of Jencks Act material in order to facilitate orderly presentation of the government's case

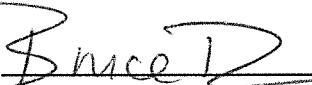
at trial.

This motion is made on all of the files and records in this case, the attached Memorandum of Law and upon other and further points and authorities as may be subsequently presented to the Court.

Respectfully submitted,

RIVERS LAW FIRM, P.A.

Dated: January 26, 2018

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